

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

Case No.: 3:09-cv-00390

FRANCES THOMAS,

Plaintiff,

v.

7-ELEVEN, INC., Formerly  
THE SOUTHLAND CORPORATION,

Defendant.

**PLAINTIFF'S INITIAL DISCLOSURES  
PURSUANT TO RULE 26(a)**

COMES NOW the plaintiff, Frances Thomas, by counsel, pursuant to Rule 26(a) of the Federal Rules of Civil Procedure and The Local Rules of Practice for the United States District Court for the Eastern District of Virginia and provides the following initial disclosure of information to defendant:

A. Individuals likely to have discoverable information that plaintiff may use to support her claims or defenses.

1. Frances Thomas  
3520 South Belmont Road  
Chesterfield, Virginia 23234
2. Linda Sales  
Management Employee of 7-Eleven who was on the premises at the time of the accident and attended plaintiff immediately after the injury.
3. Lisa Fleming (Plaintiff's Daughter)  
3380 Rolling Trail Drive  
Powhatan, Virginia 23139

Plaintiff's daughter who attended and helped the plaintiff through her treatment and difficulties from the injuries and is knowledgeable as to both subjects and as to her capabilities, activities, and health before the accident.

4. T. Robinson  
Agent or employee of  
Richmond Ambulance Authority  
2400 Hermitage Road  
Richmond, Virginia 23220

Mr. Robinson was the EMS who attended plaintiff at the scene of the accident.

5. Dr. D. Christopher Young  
West End Orthopaedic Clinic  
1400 Johnston-Willis Drive  
Richmond, Virginia 23235

Dr. Young has been a primary treating orthopaedic surgeon for the plaintiff and initially operated upon her for a comminuted shoulder fracture and a shoulder replacement procedure.

6. Dr. James E.B. Stuart, V.  
West End Orthopaedic Clinic  
7650 Parham Road, Suite 100 - MOB II  
Richmond, Virginia 23294

Dr. Stuart operated upon the plaintiff for wrist fractures that occurred as a result of the subject accident.

7. Dr. F.W. Mathewson  
Primary Health Group  
6934 Ironbridge Road  
Richmond, Virginia 23234

Dr. Mathewson is the present family physician of the plaintiff.

8. Dr. Clifton Tinsley  
Denbigh Family Practice  
13347 Warwick Boulevard  
Newport News, Virginia 23602

Dr. Tinsley was the family doctor at Midlothian Family Practice of the plaintiff for approximately three years before the subject accident. Dr. Tinsley is currently practicing at the address above.

9. Agents, Employees, and Health Care Providers Associated with  
Chippenham Medical Center  
7101 Jahnke Road  
Richmond, Virginia 23225

Where plaintiff was hospitalized and treated for her injuries following the accident from 1/2/08 to 1/11/08.

10. Agents, Employees, and Health Care Providers Associated with  
Beaumont Health Care Center

A nursing care facility where plaintiff was treated from 1/11/08 to 3/3/08.

11. Hardy Fowler, Certified Medical Illustrator  
MediVisuals  
2008 Libbie Avenue, Suite 200  
Richmond, Virginia 23226

Mr. Fowler has rendered illustrations of plaintiff's fracturing injuries and surgical procedures from the subject accident based on x-ray and imaging studies, records and reports, and input and approval from the treating physicians.

B. Documents that are available for inspection at the office of plaintiff's counsel for copying at defendant's expense which are documents in plaintiff's custody that plaintiff may use to support her claims are:

1. Richmond Ambulance Authority pre-hospital patient care report and Incident Report.
2. Chippenham Medical Center Hospital records covering plaintiff's initial treatment following the accident from 1/2/08 to 1/11/08.
3. Beaumont Health Care Center records covering nursing home treatment following her discharge from the hospital for initial treatment after the accident.
4. Records of West End Orthopaedic Clinic, Dr. Christopher Young and Dr. James E.B. Stuart.

5. Four medical illustrations rendered by certified medical illustrator Hardy Fowler and approved by plaintiff's physicians.

6. Photographs of the plaintiff taken at the hospital following her accident and surgery.

7. Photographs of plaintiff taken before her accident.

8. 1/2/08 x-ray of the right wrist; 2/1/08 x-ray of the right wrist; 1/2/08 x-ray of the right shoulder; 1/3/08 x-ray of the right shoulder.

9. Photographs of 7-Eleven Store where the subject accident occurred.

C. As Exhibit A attached hereto is a Statement of Damages or computation of each category of economic damages claimed by the plaintiff and available for inspection at the office of plaintiff's counsel are copies of the billing materials in connection with each of the medical expenses which are the economic damages claimed. See the medical records earlier referred to as to the nature and extent of the injuries suffered.

FRANCES THOMAS

By:                     /s/                      
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Counsel for Frances Thomas

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>nd</sup> day of July, 2009, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system which will then send a notification of such filing (NEF) to the following:

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